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March 20, 2025

By ECF

Hon. Kenneth M. Karas, U.S.D.J.

United States District Court for the Southern District of New York

The Hon. Charles L. Brieant Jr. Federal Building and United States Courthouse

300 Quarropas Street

White Plains, New York 10601-4150

Re: Hudson Neurosurgery, PLLC v. Archdiocese of New York**Docket No.: 7:24-cv-03489-KMK**

Dear Judge Karas:

This Firm represents Defendant Archdiocese of New York ("Defendant") in the above-referenced action.

I write on behalf of the Defendant Archdiocese of New York ("Defendant") and with the consent of the Plaintiff's counsel for the purposes of requesting that the Court permit the Defendant to file under seal, certain documents relating to its reply to Plaintiff's Opposition to its motion for summary judgment (the "Reply Papers") that contain personal identifying information and/or personal health information. The Reply Papers are scheduled to be filed on March 21, 2025.

The Court granted a similar application made by Defendant on February 18, 2025, and would request that the Court extend that order to the Reply Papers. The scope of the proposed order would authorize Defendant to redact/seal the following:

1. Defendant's reply memo of law – redaction of the identity of the individual that is referred to in the papers as the "Patient". By redacting the name, the remaining discussion in the memo of law about the care and treatment becomes non-descript because it does not identify to any specific individual.
2. Defendant's Response to Plaintiff's Counterstatement Pursuant to Rule 56.1 Statement – redaction of the identity of the individual that is referred to in the papers as the "Patient". By redacting the name, the remaining discussion in the memo of law about the care and treatment becomes non-descript because it does not identify to any specific individual.
3. Reply Exhibits – we would request permission to file under seal any additional medical records and deposition testimony that would be offered.



Hon. Kenneth M. Karas, U.S.D.J.

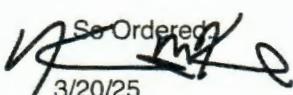
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To the extent that we can make redactions rather than filing the exhibits identified in Section 3 above under seal, we will endeavor to do so.

We thank the Court for its attention to this matter.

Granted.


Se Ordered
3/20/25

Respectfully submitted,
RIVKIN RADLER LLP

/s/ Barry I. Levy

Barry I. Levy

cc: All Counsel (via ECF)

4916-9058-9736, v. 1